

ROPES & GRAY LLP
Gregg M. Galardi
Kimberly J. Kodis
Roy G. Dixon
1211 Avenue of the Americas
New York, NY 10036-8704
Telephone: (212) 596-9000
Facsimile: (212) 596-9090
Email: Gregg.Galardi@ropesgray.com
Kimberly.Kodis@ropesgray.com
Roy.Dixon@ropesgray.com

*Counsel to the Plan Administrator for the
Debtors*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
:
In re: : Chapter 11
:
Gawker Media LLC, *et al.*,¹ : Case No. 16-11700 (SMB)
:
Debtors. : (Jointly Administered)
:
-----X

**NOTICE OF (NON-SUBSTANTIVE) OMNIBUS OBJECTION OF THE PLAN
ADMINISTRATOR, ON BEHALF OF THE DEBTORS, TO CERTAIN CLAIMS**

PLEASE TAKE NOTICE that, on June 10, 2016, Gawker Media LLC (“Gawker Media”) filed a voluntary petition for relief under chapter 11, of Title 11, of the United States Code (the “Bankruptcy Code”).

PLEASE TAKE FURTHER NOTICE that, on June 12, 2016, Gawker Media Group, Inc. (“GMGI”) and Gawker Hungary, Kft. “v.a.”, f/k/a Kinja, Kft. (“Gawker Hungary,” and together with Gawker Media and GMGI, the “Debtors”) each filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code.

PLEASE TAKE FURTHER NOTICE that, on the date hereof, William D. Holden, as the plan administrator for the Debtors, filed the attached (*Non-Substantive*) *Omnibus Objection of the Plan Administrator, on Behalf of the Debtors, to Certain Claims* (the “Objection”).

¹ The last four digits of the taxpayer identification numbers of the Debtors are: Gawker Media LLC (0492); Gawker Media Group, Inc. (3231); and Gawker Hungary, Kft. “v.a.” (5056). The Debtors’ mailing addresses are c/o AlixPartners, Attn: William D. Holden, 909 Third Avenue, 30th Floor, New York, NY 10022.

PLEASE TAKE FURTHER NOTICE that, a hearing on the Objection will take place on **August 27, 2019 at 10:00 a.m. (prevailing Eastern Time)** before the Honorable Judge Stuart M. Bernstein, at the United States Bankruptcy Court for the Southern District of New York, Alexander Hamilton Custom House, Courtroom No. 723, One Bowling Green, New York, NY 10004-1408(the "Court").

PLEASE TAKE FURTHER NOTICE that, responses to the Objection and the relief requested therein, if any, shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York, shall set forth the basis for the response or objection and the specific grounds therefore, and shall be filed with the Court electronically in accordance with General Order M-399 by registered users of the Court's case filing system (the User's Manual for the Electronic Case Filing System can be found at <http://www.nysb.uscourts.gov>, the official website for the Court), with a hard copy delivered directly to chambers pursuant to Local Bankruptcy Rule 9028-1 and served so as to be actually received no later than **August 20, 2019, at 4:00 p.m. (prevailing Eastern Time)** (the "Response Deadline"), upon: (i) the Plan Administrator for the Debtors, c/o AlixPartners, Attn: William D. Holden, 909 Third Avenue, 30th Floor, New York, NY 10022 (wholden@alixpartners.com); (ii) counsel to the Plan Administrator for the Debtors, Ropes & Gray LLP, Attn: Gregg M. Galardi and Kimberly J. Kodis, 1211 Avenue of the Americas, 34th Floor, New York, NY 10036 (Gregg.Galardi@ropesgray.com and Kimberly.Kodis@ropesgray.com); (iii) the Office of the United States Trustee for the Southern District of New York, 201 Varick Street, Suite 1006, New York, NY 10014, Attn: Greg Zipes and Susan Arbeit; (iv) the Internal Revenue Service, Attn: Centralized Insolvency Operation, 2970 Market Street, Philadelphia, PA 19104 (mimi.m.wong@irsounsel.treas.gov); (v) the United States Attorney's Office for the Southern District of New York, Attn: Bankruptcy Division, 86 Chambers Street, 3rd Floor, New York, NY 10007 (david.jones6@usdoj.gov; Jeffrey.Oestericher@usdoj.gov; Joseph.Cordaro@usdoj.gov; Carina.Schoenberger@usdoj.gov); and (vi) parties that have requested notice pursuant to Federal Rule of Bankruptcy Procedure 2002.

PLEASE TAKE FURTHER NOTICE that if you do not timely file and serve a written response to the relief requested in the Objection by the Response Deadline, the Court may deem any opposition waived, treat the Objection as conceded, and enter an order granting the relief requested in the Objection without further notice or hearing.

[Remainder of this page intentionally left blank]

PLEASE TAKE FURTHER NOTICE that, a copy of the Objection may be obtained free of charge by visiting the website of Prime Clerk LLC at <http://cases.primeclerk.com/gawker>.

Dated: July 25, 2019
New York, New York

/s/ Gregg M. Galardi
ROPE & GRAY LLP
Gregg M. Galardi
Kimberly J. Kodis
Roy G. Dixon
1211 Avenue of the Americas
New York, NY 10036-8704
Telephone: (212) 596-9000
Facsimile: (212) 596-9090
Email: Gregg.Galardi@ropesgray.com
Kimberly.Kodis@ropesgray.com
Roy.Dixon@ropesgray.com

*Counsel to the Plan Administrator for the
Debtors*